

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

08-13-07

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Order Instituting Rulemaking on the )  
Commission's Own Motion to Assess and ) R. 05-04-005  
Revise the Regulation of )  
Telecommunications Utilities. )

Rulemaking for the Purposes of Revising )  
General Order 96-A Regarding Informal ) R.98-07-038  
Filings at the Commission. )

**COMMENTS OF THE UTILITY REFORM NETWORK (TURN) ON THE  
PROPOSED DECISION OF COMMISSIONER CHONG ADOPTING  
TELECOMMUNICATIONS INDUSTRY RULES**

Dated: August 13, 2007

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## **I. INTRODUCTION**

The Utility Reform Network files these comments on the Proposed Decision issued by Commissioner Chong regarding proposed Telecommunications Industry Rules. These comments are focused on the need for additional specificity to ensure fair and effective customer notice and the problems associated with requiring carriers to “attest” to compliance with certain statutory obligations. TURN is also filing comments on the companion Proposed Decision issued July 23, 2007. Those comments address issues that may also be covered by this Proposed Decision regarding the proposals to detariff and proposals to subject carrier advice letters to a tier structure.

## **II. DISCUSSION**

### **A. Customer Notice Must Be Effective and Fair**

The Commission understands the importance of educating consumers so that customers can protect themselves in the competitive marketplace.<sup>1</sup> In theory, once a consumer has the necessary information, that consumer will make sound economic choices thereby fueling the marketplace. In order to advance this goal, the Commission has maintained a notice requirement for changes resulting in a withdrawal or transfer of service, higher rates, or more restrictive terms.<sup>2</sup>

TURN supports the customer notice requirements. While certainly not a substitute for meaningful restrictions on unfair business practices, at a minimum a company should be required to notify a consumer who is about to experience a negative

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<sup>1</sup> G.O. 168, Part 1.

<sup>2</sup> G.O. 96-B General Rule 4.2.

consequence from a company's actions. As the Commission acknowledges, this is not a new requirement, so the parties and the Commission have had some time to analyze the effectiveness of carrier notices.<sup>3</sup> However, the requirements for these notices must be analyzed in light of other changes being proposed today including a tiered advice letter structure and the possibility of detariffing. For Tier 1 advice letters that go into effect upon filing, the notices are very important. The notices may not trigger a right to protest (a filed advice letter does that), but they provide consumers and other interested parties an alert that something will be changing and the opportunity to analyze the impact of the change before it goes into place.

The bulk of the comments relied upon to support the notice provisions in the proposed rules were filed in 2001, long before the possibility of detariffing or one-day effective advice letters. Therefore, those comments and the proposed rules themselves don't go far enough to ensure an effective customer notice procedure. TURN would make the following the changes to the notice process.

*1. Serve the notice on all interested parties, including the Commission*

Carriers should have a requirement to serve a copy of the customer notice on the Commission staff and on the advice letter service list at the same time the initial round of notices are sent to customers. This proposal would merely require that the customer notice, in whatever format the carrier distributes it to its customers, is sent out to the Commission and to interested parties as early as possible. So, for example, if the carrier is providing notice of a price increase as a bill insert, then a copy of that bill insert

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<sup>3</sup> Proposed Decision at p. 16.

language should be sent to the Commission and to the advice letter service list at the same time the first wave of bills are delivered to customers.

By serving the notice, the Commission and organizations like TURN will be prepared to answer questions about the substance of the notice when receiving calls from customers. It also helps those groups monitoring the marketplace to keep an eye out for upcoming advice letters that need to be analyzed without having to review every single carrier's bills. In this way, intervenors and possible protestants will be more prepared to act quickly and give maximum notice to the Commission and the carrier that there may be a protest. TURN is not proposing any substantive rights come along with the notice.<sup>4</sup> TURN understands that some carriers already may be providing a courtesy copy of their notices to the Commission. This proposal suggests that such a practice be formalized and expanded to ensure fair treatment.

## *2. The format of the notice is important*

Requiring carriers to send a customer notice is meaningless if the customers can't find the notice, read the notice or understand the notice. The Commission must set parameters for the format of the customer notice.

While TURN has not done an extensive analysis of the URF LEC customer notices, it has reviewed the notice AT&T uses. This notice is unacceptable. For example, AT&T recently sent out a customer notice announcing a 50% increase in the per-use charge for Local Directory Assistance. This notice appeared in the July billing cycle. The notice is on the very back of what likely is a multi-page bill. It is buried under the heading of "news you can use" and then another heading "rate change". It is

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<sup>4</sup> TURN is not attempting to reargue the DRA proposal that the Advice Letter and notice are served concurrently or that a protest period begins to run with the release of the notice. (Proposed Decision at p. 20)

mixed in with recurring notices about surcharges, tariff information and repair processes, messages the customer has read once (if that) and then long ago learned to ignore. And, perhaps most egregiously, it is in less than 10 point font. This customer notice is neither fair nor effective.

The Commission should require that notices of rate increases, withdrawals of services, and more restrictive terms appear by themselves in a clear and conspicuous part of the phone bill. This information should appear in such a way that it increases the chance a customer will see the notice while reviewing call detail and the balance due. It must be properly identified as a rate increase. Use of the phrase “rate change” is too ambivalent. It should be in 10 point font at a minimum, or at least the same size as the rest of the substantive portion of the bill (not compared to the other notices).

The potential number of these notices and the importance of these notices could not have been predicted in 2001. At that time there was much more Commission review and due process afforded interested parties when a carrier requested a rate change or withdrawal of service. Today, these notices are one of the very few steps a carrier must take to raise a rate. The format of the notice becomes very important.

### *3. The term “affected customers” must be clarified*

The Rules only require that a customer notice is sent to “affected” customers. The Rules must make clear who is an “affected customer” for purposes of Industry Rule 3 and General Rule 4.2. For many services it is quite easy to determine who would qualify as an affected customer: those customers currently subscribed to a particular service. But for many other services or fees imposed by the company, a broader definition may be necessary. For example, pay-per-use services such as Call Trace do

not have recurring subscribers but a rate change would have an affect on those using the service. The same is true for non-recurring charges that do not appear on a regular basis such as a return check charge, late payment fee, or service change charge.

The Commission must be clear that if a customer has the option or possibility of paying for a certain service or paying a certain fee, regardless of the services that customer subscribes to, then that customer is “affected.” Any one of the carriers’ customers, regardless of the other services to which that customer has subscribed, can elect to use a pay-per-use service. Therefore a rate change or a change in terms of that service would affect all customers and therefore all customers should be notified. Likewise, any customer may be subject to a return check charge or a late payment fee during their relationship with the carrier, therefore a change in those fees would be affect those customers and all of the carriers’ customers should be notified.

This issue may not have been identified in 2001, but recent events have demonstrated its importance. When AT&T filed AL 29684 and 29699, to increase the return check charge, they did not send a customer notice. Only upon protest by TURN did Staff require them to provide such a notice. Likewise, when AT&T filed AL 29770 to increase the usage rates for Local Toll or AL 29682 to increase the rates for custom calling services there was no indication that they notified customers. At this point it appears that Staff and AT&T have come to some accommodation so that recent price increases have been more widely noticed. Verizon seems to be more diligent about sending customer notices. This erratic practice must be standardized and formalized to ensure customers of all carriers are adequately noticed of changes to services. The

Commission must define the term affected customer and define it broadly to ensure the notice provision is implemented properly.

*4. Exception to the notice requirements must be narrowed*

The Draft Rules propose that no notice should be required if a rate increase or withdrawal is ordered by the Commission.<sup>5</sup> This seems counterintuitive to the goal of providing consumers sufficient information. The consumer does not care why their rates are increasing, to them the end result is the same. And that end result may spur the consumer to research possible options. An advanced notice of a rate increase, or certainly a withdrawal, is essential to the consumer no matter the genesis of the change.

Perhaps the Proposed Decision is assuming that a Commission ordered change would also include an independent order to notify consumers, or that the carrier was previously required to notify consumers of the *proposed* rate increase, but that is a leap of faith that, in this new deregulated environment, TURN is not willing to accept. The rule would be much clearer to require notifications of *all* price increases and withdrawals. At a minimum the Commission should only exempt from GO-96B notice requirements those changes ordered by the Commission where the Commission explicitly requires notice independent of General Order 96-B.

**B. Carriers Must Be Required to do More than Attest to Compliance with Key Statutory Obligations**

Words have very specific meanings. When changing a single word in a proposed rule, the Commission must understand the ramifications of that change. TURN disagrees

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<sup>5</sup> Finding of Fact 14, Proposed Industry Rule 3

with the change made to Industry Rule 8.3 which would replace the word “demonstrate” with the word “attest” in two critical places. By changing these terms, the Proposed Decision radically changed the burden of proof.

The term “demonstrate” is defined as “to show clearly” or to “illustrate or explain especially with many examples.”<sup>6</sup> The use of the term “demonstrate” in proposed rule 8.3 means that the carrier filing an advice letter for a new service would have to show that or explain how its proposed service:

- Complies with all applicable Public Utility Code provisions and applicable consumer protection rules
- Does not result in degradation in quality of other services
- Would not be activated for a customer unless affirmatively requested by the customer

These elements of a new service are crucial to the PUC’s understanding of whether this new service would benefit or harm consumers. The burden of proof must be on the company introducing the new service to explain, show, or demonstrate compliance.

However, without much discussion except to suggest that requiring carriers to “demonstrate” compliance is “unnecessary and infeasible” the Proposed Decision changes that term only to require that a carrier “attest” that the requested new service will comply with the above listed elements.<sup>7</sup> To “attest” to something would certainly take less work than to demonstrate something. But should that be the goal? By lessening the requirement, the Staff evaluating a new service (and consumers considering the new service) will have much less information.

The term attest is defined as “to affirm to be true or genuine.” This definition suggests that everyone already knows or assumes the service complies with the above

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<sup>6</sup> Miriam Webster OnLine, <http://www.m-w.com/dictionary/demonstrate>

<sup>7</sup> Proposed Decision at p. 35-36.

requirements and all that is necessary is to have a representative of the company “attest” to that fact. This improperly shifts the burden of proof to those entities challenging the new service. Once the company puts a one or two line statement in its advice letter attesting to the compliance with laws or the lack of degradation, they have satisfied their burden. It is now up to a protestant to have to do the investigation and research about the new service to explain to the Commission why the new service does not comply with certain laws or does cause degradation. Because the carrier requesting the new service no longer has the burden to provide information to demonstrate compliance, those challenging the service will have an almost impossible task to disprove the attestation. While the legal affect of an attestation should dissuade carriers from taking this lightly, TURN can certainly see these sentences becoming boilerplate language in any advice letter such that the carriers don’t think about the ramifications and the Commission staff fail to take these requirements seriously.

### **C. TURN Supports The Requirement to File Applications Under Certain Circumstances**

The Proposed Decision includes language in Industry Rule 5 and Industry Rule 7.4 (4) that requires carriers to file an application or petition to request a change in a tariff condition imposed “by the Commission in an enforcement, complaint, or merger proceeding.”<sup>8</sup> TURN strongly supports this requirement. Not only is this outcome required by Commission procedural rules, but it sends a strong message that the Commission takes its enforcement and complaint procedures seriously and that requests to change previous Commission decisions will receive a high level of scrutiny. This is an important message as the Commission shifts towards deregulating services, leaving

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<sup>8</sup> Proposed Decision at p. 10.

consumers few other legal remedies than to bring after-the-fact complaints for harm done.

TURN is disappointed that this Proposed Decision only imposes this rule on prospective carrier requests and does not apply the rule to AT&T's request to be relieved of its Tariff 12 disclosure requirements. This issue has been outstanding before the Commission for an unreasonable amount of time. While the Assigned Commissioner has recently issued a Ruling proposing additional process and procedures to resolve the AT&T request and related protests, the general rule included in this Proposed Decision should guide the Commission's thinking.

### **III. CONCLUSION**

It is time for the Commission to revise General Order 96 to include updated telecommunications industry rules. TURN does not disagree with many of the proposed rules such as the customer notice requirements and the requirement to file an application or petition to change some previously imposed tariff rules. However, as discussed here and in comments filed with the companion Proposed Decision, TURN is very concerned about the method and procedures adopted today for many of the rules. In an attempt to not be prescriptive or to not dampen the marketplace, the Commission has emasculated its authority and given the carriers (at least the URF LECs and CLECs) a blank check to take advantage of consumers. By adopting the changes proposed by TURN in both sets

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of comments, the Commission will mitigate some of the potential risks to consumers from an over aggressive deregulation policy while still lessening the burden on nascent competition.

Dated: August 13, 2007

Respectfully submitted,

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## **ATTACHMENT A**

TURNs proposed revisions to Findings of Fact, Conclusions of Law and Ordering Paragraphs. Some of the changes made here are covered by comments made by TURN in the companion Proposed Decision on detariffing.

10. With the exceptions listed in Industry Rule 5, it is appropriate to allow an URF Carrier to request authority to detariff the carrier's services, in whole or part, by Tier 3 advice letter.

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13. The customer notice rule set forth in Industry Rule 3 applies to all carriers and is competitively neutral.

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14. If the Commission has ordered a carrier to provide customer notice of an approved rate increase or imposition of a more restrictive term independent of G.O. 96 B requirements, customer notice of a Compliance Advice Letter regarding the increase would be confusing and inappropriate.

Deleted: Where a duly-noticed rate increase has already been approved by the Commission,

17. Both DRA and TURN recommend that URF advice letters should be subject to suspension by the Commission. This recommendation is inconsistent with the full pricing flexibility that the Commission granted to URF Carriers in D.06-08-030.

Deleted: and that the rate changes proposed in URF advice letters should be subject to protest on grounds of unreasonableness

20. The burden of proof is on the carrier to demonstrate the compliance of their New Service offerings with applicable law.

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21. The burden of proof is on the carrier to demonstrate that their New Service offerings will not result in degradation in the quality of other service provided by the carriers.

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Deleted: It is reasonable that carriers be required to attest that

Add the following Conclusions of Law and renumber accordingly:

XX. The use of the term "affected customer" in Industry Rule 3 requiring customer notices should be clarified to include all customers who, pursuant to the services they currently have, have the option or possibility of incurring the subject rate, charge or fee or would be affected by the imposition of a more restrictive term or condition.

XX. Industry Rule 3 shall be revised to require that a customer notice, if provided on the customer's bill, must be clear and conspicuous on the bill, in 10 point font or greater, described with sufficient specificity so as to give proper notice and not included in with other less relevant notices.

XX. Industry Rule 3 shall be revised to require that the customer notice also be served on the Commission and the carrier's advice letter service list at the same time that the customer notices are mailed to consumers or the notices first appear on customer bills.

CERTIFICATE OF SERVICE

I, Larry Wong, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

On August 13, 2007 I served the attached:

**COMMENTS OF THE UTILITY REFORM NETWORK (TURN) ON THE PROPOSED  
DECISION OF COMMISSIONER CHONG ADOPTING TELECOMMUNICATIONS  
INDUSTRY RULES**

on all eligible parties on the attached lists to **R.05-04-005, R.98-07-038**, by sending said document by electronic mail to each of the parties via electronic mail, as reflected on the attached Service List.

Executed this August 13, 2007, at San Francisco, California.

\_\_\_\_\_/s/\_\_\_\_\_  
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Larry Wong

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